



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF SOCIAL JUSTICE  
Environmental Protection Bureau

December 9, 2024

BY CM/ECF

The Honorable Lewis J. Liman  
United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Chan v. U.S. Department of Transportation*  
No. 1:23-cv-10365-LJL  
*Mulgrew v. U.S. Department of Transportation*  
No. 1:24-cv-01644-LJL

Dear Judge Liman:

We write on behalf of Stephanie Winkelhake, defendant in the two above-referenced cases. On December 2, 2024, the *Chan* and *Mulgrew* plaintiffs filed summary judgment motions [*Chan* ECF Nos. 136, 136-1; *Mulgrew* ECF Nos. 124, 124-1]. Earlier today, defendants Metropolitan Transportation Authority and Triborough Bridge and Tunnel Authority (collectively, “MTA/Triborough”) filed papers opposing the plaintiffs’ motions and in support of MTA/Triborough summary judgment cross-motions [*Chan* ECF Nos. 147, 148; *Mulgrew* ECF Nos. 133, 134]. Ms. Winkelhake joins the MTA/Triborough cross-motions and opposes the plaintiffs’ motions for the reasons set out in the MTA/Triborough papers.

Respectfully submitted,

/s/ Andrew G. Frank

Andrew G. Frank  
Assistant Attorney General

c: All counsel of record (by CM/ECF):